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Attorneys for Defendant Google Inc.

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE NICKELODEON CONSUMER : Civil Action No. 12-7829 (SRC)(CLW)

PRIVACY LITIGATION

Honorable Stanley R. Chesler

NOTICE OF MOTION OF DEFENDANT

: GOOGLE INC. TO DISMISS

PLAINTIFFS' MASTER

CONSOLIDATED CLASS ACTION COMPLAINT WITH PREJUDICE

: PURSUANT TO FED. R. CIV. P. 12(b)(1)

: AND 12(b)(6)

TO: Barry R. Eichen, Esq.

This Document Relates to:

**All Actions** 

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COUNSEL:

PLEASE TAKE NOTICE that pursuant to the October 9, 2013 letter that was So Ordered by the Hon. Cathy L. Waldor, U.S.M.J., Defendant Google Inc., by and through its undersigned attorneys, will move on April 14, 2014, at 10:00 a.m., or at such other date and time as may be set by the Court, before the Hon. Stanley R. Chesler, U.S.D.J., United States District Court, District of New Jersey, Frank R. Lautenberg Post Office & Courthouse, 2 Federal Square, Newark, New Jersey 07101, for an Order, pursuant to the Fed. R. Civ. P. 12(b)(1) and 12(b)(6), dismissing Plaintiffs' Master Consolidated Class Action Complaint with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of its motion, Defendant Google Inc. will rely upon the accompanying Brief. A proposed form of Order is also being submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendant Google Inc. hereby requests oral argument.

## SILLS CUMMIS & GROSS P.C.

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By: /s/ Jeffrey J. Greenbaum

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Dated: January 15, 2014